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Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:) Case No. 08-35653 (KRH)
)
CIRCUIT CITY STORES, INC., <u>et al.</u> ,) Chapter 11
)
Debtors.)
)

NOTICE OF MOTION AND NOTICE OF HEARING (IF NECESSARY)

PLEASE TAKE NOTICE THAT the Circuit City Stores, Inc. Liquidating Trust (the “Trust”), through its Trustee, Alfred H. Siegel has filed the Liquidating Trustee’s Motion For Authority To (A) Employ Process General, LLC As Noticing Agent And (B) Utilize Trust Staff To Provide Services Of A Claims Agent; And Declarations Of Alfred H. Siegel And Peter Kravitz In Support Thereof (the “Motion”)(Docket #93363) with the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”), a copy of which has been served upon you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one). Pursuant to Local Bankruptcy Rule 2014-1, unless a written objection to the Motion is filed with the Clerk of Court and served on the moving party within fourteen (14) days hereof, the Court may deem any opposition waived, treat the Motion as conceded, and issue order(s) granting the relief requested.

PLEASE TAKE FURTHER NOTICE that absent the filing of an objection as delineated above, the Trust intends to tender the proposed order approving the Motion (which is appended to the Motion) to the Court for entry. In the event an objection is timely filed, on **July 30, 2014 at 2:00 p.m.**, (or such time thereafter as the matter may be heard) the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219, and will move the Court for entry of an order approving the Motion.

If you do not want the Court to grant the relief sought in the Motions, or if you want the Court to consider your views on the Motion, then **within fourteen (14) days** from service of this Notice you or your attorney must:

- ☒ File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order. You must mail or otherwise file it early enough so the Court will **receive** it on or before the due date identified herein.

Clerk of the Court
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

You must also serve a copy on:

Lynn L. Tavenner
Tavenner & Beran, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

Robert B. Van Arsdale, Esquire
Office of the United States Trustee
701 East Broad, Suite 4304
Richmond, Virginia 23219

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue orders granting the requested relief without further notice or hearing.

Dated: June 20, 2014

TAVENNER & BERAN, PLC

/s/ Lynn L. Tavenner

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*Counsel to Plaintiff Alfred H. Siegel, as
Trustee of the Circuit City Stores, Inc.
Liquidating Trust*

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2014, a true and correct copy of the foregoing was served via first class mail, postage prepaid, and/or electronic delivery to: (i) Office of the United States Trustee; (ii) all parties signed up to receive notice on the Bankruptcy Court's e-filing system; (iii) KCC and (iv) Process General, LLC.

/s/ Lynn L. Tavenner

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